```
THOMAS J. BOIS, II (Bar No. 110250)
 1
   JAMES C. MACDONALD (Bar No. 175760)
 2
   BOIS & MACDONALD
   2030 Main Street, Suite 660
 3
   Irvine, CA 92614
 4
   Telephone: (949) 660-0011;
   Facsimile: (949) 660-0022
 5
   Email: tbois@boismac.com
 6
         jmacdonald@boismac.com
   Attorneys for Plaintiff 3381 KATELLA
 7
   AVENUE, LLC, a California Limited Liability
 8
   Company
 9
                   UNITED STATES DISTRICT COURT
10
                 CENTRAL DISTRICT OF CALIFORNIA
11
12
   3381 KATELLA AVENUE, LLC, a
                                      CASE NO: 8:15-CV-01471-CJC-
13
   California Limited Liability Company
                                      JCGx
14
                 Plaintiff,
                                      HON. CORMAC J. CARNEY
15
                                      STIPULATION AND [PROPOSED]
        VS.
16
                                      ORDER RE DISMISSAL AS TO
17
   9980 GRINDLAY PARTNERS; MARK
                                      ALL REMAINING DEFENDANTS
   F. WARDLE; BETTY L. WARDLE;
18
   SCOTT AVENT; DIANNA
19
   RANDAZZO; ALISSA BASHMAKIAN; ) Action Filed: September 9, 2015
                                                  February 20, 2018
   HAGOP BASHMAKIAN; ARTASHES )
                                      Trial Date:
2.0
   BASHMAKIAN; HRATCH
21
   BASHMAKIAN; JOHN F. ROBINSON;)
   CLARA J. ROBINSON; LOS
22
   ALAMITOS MANAGEMENT
23
   COMPANY, INC.; BERT BERNHEIM; )
  BERNHEIM ASSOCIATES;
   GRANADA ONE HOUR CLEANERS:
25
   JOHN ROBERTSON dba GRANADA
   ONE HOUR CLEANERS: KWANG IN
26
   LIM dba GRANADA ONE HOUR
2.7
   CLEANERS; SANG SOO NE dba
28
   33915
```

1	GRANADA ONE HOUR CLEANERS; )
2	and DOES 1 – 50, inclusive.
3	Defendants.
4	)
5	
6	IT IS HEREBY STIPULATED AND AGREED that pursuant to a
7	settlement agreement entered between Plaintiff 3381 KATELLA AVENUE, LLC
8	("3381 Katella") and Defendants 9980 GRINDLAY PARTNERS; MARK F.
9	WARDLE, an individual; BETTY L. WARDLE, an individual; and Scott Avent, an
10	individual (collectively, "Defendants"); 3381 Katella hereby dismisses with prejudice
11	its complaint in its entirety against Defendants, as well as all remaining non-settling
12	defendants pursuant to Federal Rules of Civil Procedure 41 (a)(2). Each party further
13	stipulates and agrees that they shall waive all costs of litigation.
14	IT IS SO STIPULATED
15	Dated: February 18, 2020 BOIS & MACDONALD
16	
17	By: <u>/s/ James C. Macdonald</u> James C. Macdonald
18	Thomas J. Bois, II
19	Attorneys for Plaintiff 3381 Katella Avenue, LLC
20	5561 Katelia Aveilue, LLC
21	Dated: Fahmany 19, 2020   LEWIS DDISDOIS DISCAADD
22	Dated: February 18, 2020 LEWIS, BRISBOIS, BISGAARD & SMITH, LLP
23	
24	
25	By: <u>/s/ Jeremiah P. Webb</u> Jeremiah P. Webb
26	Robert W. Farrell
27	Defendants 9980 Grindlay Partners,
28	Mark F. Wardle, Betty L. Wardle, and Scott Avent
20	
	-2- Stipulation and [Proposed] Order Re Dismissal With Prejudice

**CERTIFICATION OF CONCURRENCE FROM ALL SIGNATORIES** I, James C. Macdonald, am the ECF user whose ID and password are being used to file this Stipulation and Proposed Order Re Stay In Litigation and One Year Continuance of Trial Date. In compliance with C.D. Cal. Civ. L.R. 5-4.3.4(a)(2)(i), I hereby attest that I have obtained the concurrence of each signatory to this document. /s/ James C. Macdonald James C. Macdonald -3-